

Exhibit D

McDAVID & ASSOCIATES, PC

ATTORNEYS AT LAW

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April 9, 2019

VIA CERTIFIED U.S. MAIL

Stephanie Stubbs Green
1707 Lawndale Drive
Tupelo, MS 38801

Re: Infringement of "Shake Rag" Copyright

Dear Ms. Stubbs Green:

This law firm represents Patricia Chambers and Seairra Westmoreland in connection with their intellectual property rights in the song "Shake Rag." Your continued use and claim of ownership of "Shake Rag" is a violation of my clients' copyright rights. This letter constitutes my clients' formal demand that you cease and desist any and all use of the song "Shake Rag" and cancel your fraudulent copyright registration of the same. You should immediately forward this letter to your attorney.

As you are aware, the song "Shake Rag" was written by Patricia and Seairra on or around February 24, 2017. Shortly thereafter, Patricia approached you about teaching Seairra to sing "Shake Rag" as you were then Seairra's music teacher. During that time period, you repeatedly acknowledged that Patricia was the sole author of "Shake Rag" on social media, which is well-documented. On April 11, 2017, you traveled to Fame Recording in Muscle Shoals, Alabama where you recorded "Shake Rag" with Seairra. You and Patricia split the cost of the studio time and the musicians who created the sheet music to accompany the song based on Seairra's melody. Eight days later, on April 19, 2017, you copyrighted the song, listing yourself as the composer of the entirety of the music, lyrics, musical arrangement, vocals, and background vocals. This action constitutes fraud upon the United States Copyright Office as you made willful and deliberately false statements regarding your alleged ownership of the elements of "Shake Rag."

Since that time, you have also engaged in several local performances claiming "Shake Rag" as your own, beginning with the 2017 Tupelo Elvis Festival. You released the song on iTunes, Amazon music, and a number of other digital outlets on August 6, 2017. In September of 2017, you provided the song to Blue Magnolia Films for use as part of their Mississippi Bicentennial Project, in video about Elvis Presley called "A Boy from Tupelo." The video and subsequent promotion lists you as "Shake Rag's" sole composer. This activity is actionable under federal law

and causes you to be liable to use in every state in which you have made sales. Your activities are unlawful and constitute copyright infringement.

In the event of litigation under copyright claims, my clients are entitled to:

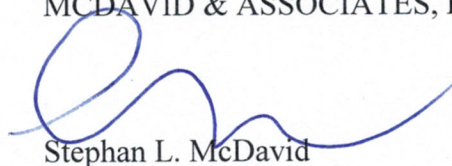
1. Your profits attributable to the infringement;
2. Actual damages to my clients, including those based upon your actions to remove their version of "Shake Rag" from Soundclick.com, YouTube.com, and other online outlets.
3. Alternatively, since my clients' copyright has been registered with the Copyright Office, my clients are entitled to both statutory damages in the amount of up to \$30,000.00, which can be enhanced up to \$150,000.00 for willfulness as an alternative to actual damages and profits.
4. In the event that my clients are successful in connection with litigation, they may also recover their attorney's fees from you.

Please be advised that Patricia Chambers and Seaira Westmoreland will undertake all appropriate steps to protect their intellectual property rights in "Shake Rag." You can avoid legal action by immediately ceasing and desisting from any and all infringing activity involving the use of "Shake Rag," including all promotional and/or commercial activities, and cancelling your copyright registration. If we have not received an affirmative response from you by **Friday, April 19, 2019**, indicating that you have fully complied with these requirements, we will take any and all legal remedies available to rectify this situation.

If you have any questions, feel free to contact me at 662.281.8300.

Sincerely,

MCDavid & ASSOCIATES, PC



Stephan L. McDavid